

REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Claims 1, 38, and 40 are currently being amended. This amendment adds, changes and/or deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

In the Office Action, claims 38 and 40 were objected to due to minor informalities. By this Amendment, Applicant has amended claims 38 and 40 so that they correctly depend from claim 21. Accordingly, Applicant requests that this objection be withdrawn.

Claims 1-4, 6-12, 15-16, 18 and 20 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 1 has been amended to add that the method is performed in accordance with code residing in a storage device and to add a step of storing the data model for the XML-type document, the data model for the first type of document, and the mapping rules in the storage device. Applicant submits that amended claim 1 and the claims depending therefrom are in conformance with 35 U.S.C. § 101, and therefore requests that the rejection of these claims under 35 U.S.C. § 101 be withdrawn.

Claims 1-3, 7-16, 18, 20-23, 27-36, 38, 40-42, and 45-46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Eck (U.S. Publication No. 2002/0129059) in view of Myllymaki ("Effective Web Data Extraction with Standard XML Technologies").

Claim 1 recites that a method for translating between an XML-type document and a first type of document, comprises generating a data model for the XML-type document based on an XML data source, generating a data model for the first type of document based on the XML data source, creating mapping rules between the data model for the XML-type document and the data model for the first type of document, and storing the data model for the XML-type document, the data model for the first type of document, and the mapping rules in a storage device. The method further comprises verifying that the XML-type document is well-formed based upon the data model for the XML-type document.

In the rejection, it is admitted that Eck does not disclose that mapping rules are created between the data model for the XML-type document and the data model for the first type of document and verifying that the XML-type document is well formed based upon the data model for the XML-type document. It is asserted, however, that Myllymaki cures both of these deficiencies. Applicant respectfully disagrees with this assertion.

Myllymaki discloses a mechanism for mapping extracted data to a target structure (p. 690, col. 1, ¶ 2). In particular, a graphical user interface generates retrieval, extraction and mapping rules (p. 690, col. 1, ¶ 2).

In addition, Myllymaki discloses that target HTML pages are subjected to a sequence of data extraction steps, but much of the HTML content on the Web is ill-formed because it does not conform to HTML specifications (p. 691, § 3.2, ¶ 1). As a result, Myllymaki discloses that a first step in data extraction is to translate the content to a well-formed XML syntax to help in subsequent data extraction steps (p. 691, § 3.2, ¶ 1). More specifically, an original HTML page is passed through a filter that “repairs” the broken syntax and produces well-formed HTML. (p. 691, § 3.2, ¶ 1).

In contrast to claim 1, Myllymaki fails to disclose or suggest verifying that the XML-type document is well-formed based upon the data model for the XML-type document. Rather, Myllymaki discloses translating content of ill-formed HTML pages into a well-formed XML syntax. Myllymaki does not, however, disclose or suggest any verification that the translated content is well-formed. There is also no disclosure or suggestion of referencing the data model for the XML-type document to verify that the XML-type document is well-formed.

Accordingly, even assuming that Myllymaki is combinable with Eck, Myllymaki fails to disclose the deficiencies of Eck. In particular, as expressly admitted in the rejection with respect to Eck, Myllymaki also fails to disclose or suggest verifying that the XML-type document is well-formed based upon the data model for the XML-type document. Claim 1 is therefore patentably distinguishable from the combination of Eck and Myllymaki.

Claims 2-3, 7-16, 18, and 20 are patentably distinguishable from the combination of Eck and Myllymaki by virtue of their dependence from claim 1, as well as their additional

recitations. Claims 21, 41, and 45 are patentably distinguishable from the combination of Eck and Myllymaki for reasons analogous to claim 1. Claims 22-23, 27-36, 38, 40, 42, and 46 are patentably distinguishable from the combination of Eck and Myllymaki by virtue of their dependence from claim 21, 41, or 45, as well as their additional recitations.

The remaining claims 4-6, 24-26, 43-44, and 47-48 were rejected by the combination of Eck and Myllymaki and further in view of Webber (U.S. Patent No. 6,418,400), Huang (U.S. Publication No. 2002/0147748), or De La Huerga (U.S. Patent No. 6,516,321). Like Eck and Myllymaki, none of these references discloses or suggests verifying that the XML-type document is well formed based upon the data model for the XML type document. Accordingly, even if combinable, claims 4-6, 24-26, 43-44, and 47-48 are patentably distinguishable from the asserted combinations by virtue of their dependency from claims 1, 21, 41, and 45, respectively, as well as their additional recitations.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of

papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R.
§1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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